

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TRUTEK CORP.,

Plaintiff,

v.

YEONG WAN CHO (a.k.a. PETER CHO,
ET AL.,

Defendants.

Civil Action No.: 2:23– cv-3709

Document Electronically Filed

**JOINT LETTER SUMMARIZING STATUS OF THE CASE
AND NOTICE OF FILING OF IPR PROCEEDING**

Pursuant to the Court’s May 29, 2024, Text Order, Plaintiff Trutek Corp. (Trutek) and all defendants that have been made parties to this action, Defendants Salvacion, USA, Inc., Yeong Wan Cho (aka Peter Cho), Salvacion International, LLC, and BioSure Global, Ltd. hereby present this Joint Letter summarizing the status of the case and notifying the Court that an IPR Proceeding has been filed.

1. Trutek filed its Complaint on July 11, 2023.
2. On October 25, 2023, Defendants Salvacion, USA, Inc., Yeong Wan Cho (aka Peter Cho), Salvacion International, LLC, and BioSure Global, Ltd. served their Consolidated Motions to Dismiss, which are fully briefed and are currently pending before the Court.
3. The parties have stipulated and agreed that discovery as to BioSure Global, Ltd. should be stayed until the Court determines whether it may exercise jurisdiction over BioSure Global, Ltd.

4. On February 12, 2024, Trutek filed a Motion to Stay Case “until a final judgment has been issued on Defendants Inter Partes Review (IPR) proceedings with the United States Patent and Trademark Office.” Doc. 70 at 5.

5. Defendants originally intended to oppose Trutek’s Motion to Stay Case because there are nine other causes of action (every cause of action other than Count I) in Trutek’s Complaint that the IPR proceeding will not affect.

6. However, subject to and for the consideration in the Agreement to Seek Stay and Covenant Not to Challenge (attached as Exhibit 1 to Defendants Response to Trutek’s Motion to Stay Case), Defendants filed a response stipulating to Trutek’s Motion to Stay Case.

7. Trutek’s Motion to Stay Case is fully briefed and is pending before the Court.

8. **Defendant Salvacion has filed an IPR proceeding on or about May 28, 2024.**

9. Trutek’s Motion to Stay Case is now fully ready to be decided by the Court.

10. Plaintiff’s Counsel has authorized undersigned to submit this letter jointly.

Respectfully submitted, this the 5th day of June, 2024.

LADDEY, CLARK & RYAN, LLP

BY: /s/ Travis Nunziato

Thomas N. Ryan (018951985)
Travis Nunziato (155202015)
60 Blue Heron Road, Suite 300
Sparta, New Jersey 07871-2600
Telephone: (973) 729-1880;
Facsimile: (973) 729-1224
tryan@lclrlaw.com
twhite@lclrlaw.com

*Attorneys for Defendants Salvacion,
USA, Inc.; Salvacion Co., LTD.; Yeong
Wan Cho (aka Peter Cho); Salvacion
R&D Center; Salvacion International,
LLC; Sei Young Yun; Biosure Global, Ltd.*

BRADLEY ARANT BOULT CUMMINGS LLP

Jason E. Fortenberry (*pro hac vice*)
Jonathan M. Barnes (*pro hac vice*)
188 East Capitol Street, Suite 1000
Post Office Box 1789
Jackson, Mississippi 39215-1789
Telephone: (601) 948-8000
Facsimile: (601) 948-3000
jfortenberry@bradley.com
jbarnes@bradley.com

Jeffrey D. Dyess (*pro hac vice*)
Benn C. Wilson (*pro hac vice*)
1819 5th Avenue North
Birmingham, Alabama
Telephone: (205) 521-8000
Facsimile: (205) 521-8800
jdyess@bradley.com

bcwilson@bradley.com

*Attorneys for Defendants Salvacion,
USA, Inc.; Salvacion Co., LTD.; Yeong
Wan Cho (aka Peter Cho); Salvacion
R&D Center; Salvacion International,
LLC; Sei Young Yun; Biosure Global, Ltd.*

/s/ Solomon M. Radner
LAW OFFICE OF KEITH ALTMAN
Solomon Radner (NJ SBN 283502018)
Keith Altman (counsel *pro hac vice*)
33228 West 12 Mile Road, Suite 375
Farmington Hills, MI 48334
Telephone: (248) 987-8929
Facsimile: (248) 213-9907
solomonradner@kaltmanlaw.com
keithaltman@kaltmanlaw.com

Attorneys for Plaintiff Trutek Corp.

Stanley H. Kremen (counsel *pro hac vice*)
Law Office of Stanley H. Kremen, Esq.
4 Lenape Lane
East Brunswick, NJ 08816
Telephone: (732) 593-7294
Facsimile: (732) 312-5218
shk@shk-dplc.com

Attorney for Plaintiff Trutek Corp.